

EXHIBIT B

From: [Gulay, Erol](#)
To: [Guerrier, Pascale](#)
Cc: [Zornberg, Lisa](#); ["Tatz, Nicole"](#); ["Levander, Samuel"](#); ["mflumenbaum@paulweiss.com"](#); ["mgertzman@paulweiss.com"](#); ["Dearborn, Meredith \(mdearborn@paulweiss.com\)"](#); ["Linsenmayer, Robin \(rlinsenmayer@paulweiss.com\)"](#); ["Bunting, Kristina" \(kbunting@paulweiss.com\)"](#); ["mkellogg@kelloggghansen.com"](#); ["rfigel@kelloggghansen.com"](#); ["Oppenheimer, Bradley E. <boppenheimer@kelloggghansen.com> \(boppenheimer@kelloggghansen.com\)"](#); ["Pfeffer, Eliana M. \(epfeffer@kelloggghansen.com\)"](#); ["White, Collin R." \(cwhite@kelloggghansen.com\)"](#); [Gressel, Anna](#); [Ford, Christopher S.](#); [Ceresney, Andrew J.](#); ["Solomon, Matthew"](#); ["Janghorbani, Alexander"](#); ["Bamberger, Nowell D."](#); [Daniels, Jon](#); [Moye, Robert M.](#); [Hanauer, Benjamin J.](#); [Stewart, Ladan F.](#); [Tenreiro, Jorge](#); [Sylvester, Mark](#); [Goody, Elizabeth](#); [Augustini, Hope Hall](#); [Waxman, Daphna A.](#)
Subject: RE: Document Production-Recordings
Date: Monday, October 11, 2021 12:00:41 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Pascale,

The file name for that recording as appears in the metadata that was produced to the SEC is Ch1_Full_2019-04-22T12_04.mp4. The custodian is RippleVC.

Thanks,
Erol

From: Guerrier, Pascale [mailto:guerrierp@SEC.GOV]
Sent: Wednesday, October 06, 2021 18:16
To: Gulay, Erol
Cc: Zornberg, Lisa; 'Tatz, Nicole'; 'Levander, Samuel'; 'mflumenbaum@paulweiss.com'; 'mgertzman@paulweiss.com'; 'Dearborn, Meredith (mdearborn@paulweiss.com)'; 'Linsenmayer, Robin (rlinsenmayer@paulweiss.com)'; 'Bunting, Kristina' (kbunting@paulweiss.com)'; 'mkellogg@kelloggghansen.com'; 'rfigel@kelloggghansen.com'; 'Oppenheimer, Bradley E. <boppenheimer@kelloggghansen.com> (boppenheimer@kelloggghansen.com)'; 'Pfeffer, Eliana M. (epfeffer@kelloggghansen.com)'; 'White, Collin R.' (cwhite@kelloggghansen.com)'; Gressel, Anna; Ford, Christopher S.; Ceresney, Andrew J.; 'Solomon, Matthew'; 'Janghorbani, Alexander'; 'Bamberger, Nowell D.'; Daniels, Jon; Moye, Robert M.; Hanauer, Benjamin J.; Stewart, Ladan F; Tenreiro, Jorge; Sylvester, Mark; Goody, Elizabeth; Augustini, Hope Hall; Waxman, Daphna A.
Subject: RE: Document Production-Recordings

Erol-

Can you please provide an update on when we should expect the meeting name and custodian for the meeting referenced in RPLI_SEC 0450812?

Thank you,

Pascale

Pascale Guerrier
SECURITIES AND EXCHANGE COMMISSION
New York Regional Office
Brookfield Place
200 Vesey Street, Suite 400

New York, New York 10281-1022
(212) 336-5473
GuerrierP@sec.gov

From: Waxman, Daphna A. <WaxmanD@SEC.GOV>
Sent: Thursday, September 30, 2021 12:31 PM
To: Gulay, Erol <egulay@debevoise.com>; Guerrier, Pascale <guerrierp@SEC.GOV>
Cc: Zornberg, Lisa <lzornberg@debevoise.com>; 'Tatz, Nicole' <ntatz@cgsh.com>; 'Levander, Samuel' <slevander@cgsh.com>; 'mflumenbaum@paulweiss.com' <mflumenbaum@paulweiss.com>; 'mgertzman@paulweiss.com' <mgertzman@paulweiss.com>; 'Dearborn, Meredith (mdearborn@paulweiss.com)' <mdearborn@paulweiss.com>; 'Linsenmayer, Robin (rlinsenmayer@paulweiss.com)' <rlinsenmayer@paulweiss.com>; 'Bunting, Kristina' (kbunting@paulweiss.com) <kbunting@paulweiss.com>; 'mkellogg@kellogghansen.com' <mkellogg@kellogghansen.com>; 'rfigel@kellogghansen.com' <rfigel@kellogghansen.com>; 'Oppenheimer, Bradley E. <boppenheimer@kellogghansen.com> (boppenheimer@kellogghansen.com)' <boppenheimer@kellogghansen.com>; 'Pfeffer, Eliana M. (epfeffer@kellogghansen.com)' <epfeffer@kellogghansen.com>; 'White, Collin R.' (cwhite@kellogghansen.com) <cwhite@kellogghansen.com>; Gressel, Anna <argressel@debevoise.com>; Ford, Christopher S. <csford@debevoise.com>; Ceresney, Andrew J. <aceresney@debevoise.com>; 'Solomon, Matthew' <msolomon@cgsh.com>; 'Janghorbani, Alexander' <ajanghorbani@cgsh.com>; 'Bamberger, Nowell D.' <nbamberger@cgsh.com>; Daniels, Jon <danielsj@SEC.GOV>; Moye, Robert M. <MoyeR@sec.gov>; Hanauer, Benjamin J. <HanauerB@sec.gov>; Stewart, Ladan F <stewartla@SEC.GOV>; Tenreiro, Jorge <tenreiroj@SEC.GOV>; Sylvester, Mark <sylvesterm@SEC.GOV>; Goody, Elizabeth <GoodyE@SEC.GOV>; Augustini, Hope Hall <AugustiniH@SEC.GOV>
Subject: RE: Document Production-Recordings

Erol – Thank you for your email stating that you will produce a recording of the meeting referenced in RPLI_SEC 0450812. Will you please provide the name of meeting and the custodian as it appears in your files?

Daphna

From: Gulay, Erol <egulay@debevoise.com>
Sent: Tuesday, September 28, 2021 9:46 AM
To: Guerrier, Pascale <guerrierp@SEC.GOV>
Cc: Zornberg, Lisa <lzornberg@debevoise.com>; 'Tatz, Nicole' <ntatz@cgsh.com>; 'Levander, Samuel' <slevander@cgsh.com>; 'mflumenbaum@paulweiss.com' <mflumenbaum@paulweiss.com>; 'mgertzman@paulweiss.com' <mgertzman@paulweiss.com>; 'Dearborn, Meredith (mdearborn@paulweiss.com)' <mdearborn@paulweiss.com>; 'Linsenmayer, Robin (rlinsenmayer@paulweiss.com)' <rlinsenmayer@paulweiss.com>; 'Bunting, Kristina' (kbunting@paulweiss.com) <kbunting@paulweiss.com>; 'mkellogg@kellogghansen.com' <mkellogg@kellogghansen.com>; 'rfigel@kellogghansen.com' <rfigel@kellogghansen.com>; 'Oppenheimer, Bradley E. <boppenheimer@kellogghansen.com> (boppenheimer@kellogghansen.com)' <boppenheimer@kellogghansen.com>; 'Pfeffer, Eliana M.

(epfeffer@kelloggghansen.com)' <epfeffer@kelloggghansen.com>; 'White, Collin R.' (cwhite@kelloggghansen.com)' <cwhite@kelloggghansen.com>; Gressel, Anna <argressel@debevoise.com>; Ford, Christopher S. <csford@debevoise.com>; Ceresney, Andrew J. <aceresney@debevoise.com>; 'Solomon, Matthew' <msolomon@cgsh.com>; 'Janghorbani, Alexander' <ajanghorbani@cgsh.com>; 'Bamberger, Nowell D.' <nbamberger@cgsh.com>; Daniels, Jon <danielsj@SEC.GOV>; Moye, Robert M. <MoyeR@sec.gov>; Hanauer, Benjamin J. <HanauerB@sec.gov>; Stewart, Ladan F <stewartla@SEC.GOV>; Waxman, Daphna A. <WaxmanD@SEC.GOV>; Tenreiro, Jorge <tenreiroj@SEC.GOV>; Sylvester, Mark <sylvesterm@SEC.GOV>; Goody, Elizabeth <GoodyE@SEC.GOV>; Augustini, Hope Hall <AugustiniH@SEC.GOV>

Subject: RE: Document Production-Recordings

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Pascale,

By way of update, this week we will be producing a recording of the meeting referenced in RPLI_SEC 0450812.

Thanks,
Erol

From: Guerrier, Pascale [<mailto:guerrierp@SEC.GOV>]
Sent: Tuesday, September 21, 2021 11:01
To: Gulay, Erol
Cc: Zornberg, Lisa; 'Tatz, Nicole'; 'Levander, Samuel'; 'mflumenbaum@paulweiss.com'; 'mgertzman@paulweiss.com'; 'Dearborn, Meredith' (mdearborn@paulweiss.com); 'Linsenmayer, Robin' (rlinsenmayer@paulweiss.com); 'Bunting, Kristina' (kbunting@paulweiss.com); 'mkellogg@kelloggghansen.com'; 'rfigel@kelloggghansen.com'; 'Oppenheimer, Bradley E.' <boppenheimer@kelloggghansen.com> (boppenheimer@kelloggghansen.com); 'Pfeffer, Eliana M.' (epfeffer@kelloggghansen.com); 'White, Collin R.' (cwhite@kelloggghansen.com); Gressel, Anna; Ford, Christopher S.; Ceresney, Andrew J.; 'Solomon, Matthew'; 'Janghorbani, Alexander'; 'Bamberger, Nowell D.'; Daniels, Jon; Moye, Robert M.; Hanauer, Benjamin J.; Stewart, Ladan F; Waxman, Daphna A.; Tenreiro, Jorge; Sylvester, Mark; Goody, Elizabeth; Augustini, Hope Hall
Subject: RE: Document Production-Recordings

Thank you.

From: Gulay, Erol <egulay@debevoise.com>
Sent: Tuesday, September 21, 2021 10:51 AM
To: Guerrier, Pascale <guerrierp@SEC.GOV>
Cc: Zornberg, Lisa <zornberg@debevoise.com>; 'Tatz, Nicole' <ntatz@cgsh.com>; 'Levander, Samuel' <slevander@cgsh.com>; 'mflumenbaum@paulweiss.com' <mflumenbaum@paulweiss.com>; 'mgertzman@paulweiss.com' <mgertzman@paulweiss.com>; 'Dearborn, Meredith' (mdearborn@paulweiss.com) <mdearborn@paulweiss.com>; 'Linsenmayer, Robin' (rlinsenmayer@paulweiss.com) <rlinsenmayer@paulweiss.com>; 'Bunting, Kristina' (kbunting@paulweiss.com) <kbunting@paulweiss.com>; 'mkellogg@kelloggghansen.com'

<mkellogg@kellogghansen.com>; 'rfigel@kellogghansen.com' <rfigel@kellogghansen.com>;
'Oppenheimer, Bradley E.' <boppenheimer@kellogghansen.com>
(boppenheimer@kellogghansen.com)' <boppenheimer@kellogghansen.com>; 'Pfeffer, Eliana M.
(epfeffer@kellogghansen.com)' <epfeffer@kellogghansen.com>; 'White, Collin R.'
(cwhite@kellogghansen.com)' <cwhite@kellogghansen.com>; Gressel, Anna
<argressel@debevoise.com>; Ford, Christopher S. <csford@debevoise.com>; Ceresney, Andrew J.
<aceresney@debevoise.com>; 'Solomon, Matthew' <msolomon@cgsh.com>; 'Janghorbani,
Alexander' <ajanghorbani@cgsh.com>; 'Bamberger, Nowell D.' <nbamberger@cgsh.com>; Daniels,
Jon <danielsj@SEC.GOV>; Moye, Robert M. <MoyeR@sec.gov>; Hanauer, Benjamin J.
<HanauerB@sec.gov>; Stewart, Ladan F <stewartla@SEC.GOV>; Waxman, Daphna A.
<WaxmanD@SEC.GOV>; Tenreiro, Jorge <tenreiroj@SEC.GOV>; Sylvester, Mark
<sylvesterm@SEC.GOV>; Goody, Elizabeth <GoodyE@SEC.GOV>; Augustini, Hope Hall
<AugustiniH@SEC.GOV>

Subject: RE: Document Production-Recordings

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Hi Pascale,

We are working on your request and will get back to you.

Thanks,
Erol

From: Guerrier, Pascale [<mailto:guerrierp@SEC.GOV>]

Sent: Tuesday, September 21, 2021 10:08

To: Gulay, Erol

Cc: Zornberg, Lisa; 'Tatz, Nicole'; 'Levander, Samuel'; 'mflumenbaum@paulweiss.com';
'mgertzman@paulweiss.com'; 'Dearborn, Meredith' (mdearborn@paulweiss.com); 'Linsenmayer, Robin
(rlinsenmayer@paulweiss.com)'; 'Bunting, Kristina' (kbunting@paulweiss.com);
'mkellogg@kellogghansen.com'; 'rfigel@kellogghansen.com'; 'Oppenheimer, Bradley E.
<boppenheimer@kellogghansen.com>' (boppenheimer@kellogghansen.com); 'Pfeffer, Eliana M.
(epfeffer@kellogghansen.com); 'White, Collin R.' (cwhite@kellogghansen.com); Gressel, Anna; Ford,
Christopher S.; Ceresney, Andrew J.; 'Solomon, Matthew'; 'Janghorbani, Alexander'; 'Bamberger, Nowell
D.'; Daniels, Jon; Moye, Robert M.; Hanauer, Benjamin J.; Stewart, Ladan F; Waxman, Daphna A.;
Tenreiro, Jorge; Sylvester, Mark; Goody, Elizabeth; Augustini, Hope Hall

Subject: RE: Document Production-Recordings

Good morning Erol,

Can you please provide an update on production of the recording regarding the company meeting we discussed at the meet and confer last Friday referenced in RPLI_SEC 0450812-13?

Thank you.

Pascale
Pascale Guerrier
SECURITIES AND EXCHANGE COMMISSION

New York Regional Office
Brookfield Place
200 Vesey Street, Suite 400
New York, New York 10281-1022
(212) 336-5473
GuerrierP@sec.gov

From: Gulay, Erol <egulay@debevoise.com>

Sent: Wednesday, September 15, 2021 12:14 PM

To: Guerrier, Pascale <guerrierp@SEC.GOV>; Zornberg, Lisa <lzornberg@debevoise.com>; 'Tatz, Nicole' <ntatz@cgsh.com>; 'Levander, Samuel' <slevander@cgsh.com>; 'mflumenbaum@paulweiss.com' <mflumenbaum@paulweiss.com>; 'mgertzman@paulweiss.com' <mgertzman@paulweiss.com>; 'Dearborn, Meredith' (<mdearborn@paulweiss.com>)' <mdearborn@paulweiss.com>; 'Linsenmayer, Robin' (<rlinsenmayer@paulweiss.com>)' <rlinsenmayer@paulweiss.com>; 'Bunting, Kristina' (<kbunting@paulweiss.com>)' <kbunting@paulweiss.com>; 'mkellogg@kelloggghansen.com' <mkellogg@kelloggghansen.com>; 'rfigel@kelloggghansen.com' <rfigel@kelloggghansen.com>; 'Oppenheimer, Bradley E.' <boppenheimer@kelloggghansen.com> (<boppenheimer@kelloggghansen.com>)' <boppenheimer@kelloggghansen.com>; 'Pfeffer, Eliana M.' (<epfeffer@kelloggghansen.com>)' <epfeffer@kelloggghansen.com>; 'White, Collin R.' (<cwhite@kelloggghansen.com>)' <cwhite@kelloggghansen.com>; Gressel, Anna <argressel@debevoise.com>; Ford, Christopher S. <csford@debevoise.com>; Ceresney, Andrew J. <aceresney@debevoise.com>; 'Solomon, Matthew' <msolomon@cgsh.com>; 'Janghorbani, Alexander' <ajanghorbani@cgsh.com>; 'Bamberger, Nowell D.' <nbamberger@cgsh.com>

Cc: Daniels, Jon <danielsj@SEC.GOV>; Moye, Robert M. <MoyeR@sec.gov>; Hanauer, Benjamin J. <HanauerB@sec.gov>; Stewart, Ladan F <stewartla@SEC.GOV>; Waxman, Daphna A. <WaxmanD@SEC.GOV>; Tenreiro, Jorge <tenreiroj@SEC.GOV>; Sylvester, Mark <sylvesterm@SEC.GOV>; Goody, Elizabeth <GoodyE@SEC.GOV>; Augustini, Hope Hall <AugustiniH@SEC.GOV>

Subject: RE: Document Production-Recordings

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Pascale,

This recording was produced on Friday under Bates number **RPLI_SEC 1100541**. Thanks.

Erol

From: Guerrier, Pascale [<mailto:guerrierp@SEC.GOV>]

Sent: Wednesday, September 15, 2021 08:32

To: Gulay, Erol; Zornberg, Lisa; 'Tatz, Nicole'; 'Levander, Samuel'; 'mflumenbaum@paulweiss.com'; 'mgertzman@paulweiss.com'; 'Dearborn, Meredith' (<mdearborn@paulweiss.com>); 'Linsenmayer, Robin' (<rlinsenmayer@paulweiss.com>); 'Bunting, Kristina' (<kbunting@paulweiss.com>);

'mkellogg@kelloggghansen.com'; 'rfigel@kelloggghansen.com'; 'Oppenheimer, Bradley E. <boppenheimer@kelloggghansen.com> (boppenheimer@kelloggghansen.com)'; 'Pfeffer, Eliana M. (epfeffer@kelloggghansen.com)'; 'White, Collin R.' (cwhite@kelloggghansen.com)'; Gressel, Anna; Ford, Christopher S.; Ceresney, Andrew J.; 'Solomon, Matthew'; 'Janghorbani, Alexander'; 'Bamberger, Nowell D.'

Cc: Daniels, Jon; Moye, Robert M.; Hanauer, Benjamin J.; Stewart, Ladan F; Waxman, Daphna A.; Tenreiro, Jorge; Sylvester, Mark; Goody, Elizabeth; Augustini, Hope Hall

Subject: RE: Document Production-Recordings

Erol,

Thank you for agreeing to review the recording of the meeting referenced in RPLI_SEC 0866480 for responsiveness. Could you please provide an update on the status of production?

Regards,

Pascale
Pascale Guerrier
SECURITIES AND EXCHANGE COMMISSION
New York Regional Office
Brookfield Place
200 Vesey Street, Suite 400
New York, New York 10281-1022
(212) 336-5473
GuerrierP@sec.gov

From: Gulay, Erol <egulay@debevoise.com>

Sent: Thursday, September 9, 2021 9:52 AM

To: Guerrier, Pascale <guerrierp@SEC.GOV>; Zornberg, Lisa <lzornberg@debevoise.com>; 'Tatz, Nicole' <ntatz@cgsh.com>; 'Levander, Samuel' <slevander@cgsh.com>; 'mflumenbaum@paulweiss.com' <mflumenbaum@paulweiss.com>; 'mgertzman@paulweiss.com' <mgertzman@paulweiss.com>; 'Dearborn, Meredith' (mdearborn@paulweiss.com)' <mdearborn@paulweiss.com>; 'Linsenmayer, Robin' (rlinsenmayer@paulweiss.com)' <rlinsenmayer@paulweiss.com>; 'Bunting, Kristina' (kbunting@paulweiss.com)' <kbunting@paulweiss.com>; 'mkellogg@kelloggghansen.com' <mkellogg@kelloggghansen.com>; 'rfigel@kelloggghansen.com' <rfigel@kelloggghansen.com>; 'Oppenheimer, Bradley E. <boppenheimer@kelloggghansen.com> (boppenheimer@kelloggghansen.com)' <boppenheimer@kelloggghansen.com>; 'Pfeffer, Eliana M. (epfeffer@kelloggghansen.com)' <epfeffer@kelloggghansen.com>; 'White, Collin R.' (cwhite@kelloggghansen.com)' <cwhite@kelloggghansen.com>; Gressel, Anna <argressel@debevoise.com>; Ford, Christopher S. <csford@debevoise.com>; Ceresney, Andrew J. <aceresney@debevoise.com>; 'Solomon, Matthew' <msolomon@cgsh.com>; 'Janghorbani, Alexander' <ajanghorbani@cgsh.com>; 'Bamberger, Nowell D.' <nbamberger@cgsh.com>

Cc: Daniels, Jon <danielsj@SEC.GOV>; Moye, Robert M. <MoyeR@sec.gov>; Hanauer, Benjamin J. <HanauerB@sec.gov>; Stewart, Ladan F <stewartla@SEC.GOV>; Waxman, Daphna A.

<WaxmanD@SEC.GOV>; Tenreiro, Jorge <tenreiroj@SEC.GOV>; Sylvester, Mark
<sylvesterm@SEC.GOV>; Goody, Elizabeth <GoodyE@SEC.GOV>; Augustini, Hope Hall
<AugustiniH@SEC.GOV>

Subject: RE: Document Production-Recordings

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Pascale,

This is the first time that the SEC has sought production of the recorded meeting referenced in the document produced at RPLI_SEC 0866480, which was produced to the SEC more than two months ago, on July 2. The meeting was not a quarterly all-hands meeting and does not otherwise come within the scope of any of the SEC's other recording requests. Further, none of the 33 custodians are custodians of the recording, and the meeting name as it appears in Ripple's records does not suggest that the meeting is potentially responsive. As this is the first time the SEC has requested this particular recording, and as the fact discovery period ended last week, on August 31, the SEC's request is dilatory and improper.

Nevertheless, in a good faith effort to achieve a reasonable compromise without further burdening the Court on yet another discovery-related matter, Ripple agrees to review the recording and to produce it to the extent it is responsive and not privileged. Ripple's agreement to produce the recording should not be construed as a waiver of our rights to oppose future SEC discovery requests on the ground that the fact discovery period has expired. Ripple reserves all other rights.

Thanks,
Erol

From: Guerrier, Pascale [<mailto:guerrierp@SEC.GOV>]

Sent: Wednesday, September 08, 2021 10:02

To: Zornberg, Lisa; Gulay, Erol; Tatz, Nicole; 'Levander, Samuel' (mflumenbaum@paulweiss.com); 'mgertzman@paulweiss.com'; 'Dearborn, Meredith' (mdearborn@paulweiss.com); 'Linsenmayer, Robin' (rlinsenmayer@paulweiss.com); 'Bunting, Kristina' (kbunting@paulweiss.com); 'mkellogg@kelloggghansen.com'; 'rfigel@kelloggghansen.com'; 'Oppenheimer, Bradley E.' <boppenheimer@kelloggghansen.com> (boppenheimer@kelloggghansen.com); 'Pfeffer, Eliana M.' (epfeffer@kelloggghansen.com); 'White, Collin R.' (cwhite@kelloggghansen.com); Gressel, Anna; Ford, Christopher S.; Ceresney, Andrew J.; 'Solomon, Matthew'; 'Janghorbani, Alexander'; 'Bamberger, Nowell D.'

Cc: Daniels, Jon; Moye, Robert M.; Hanauer, Benjamin J.; Stewart, Ladan F; Waxman, Daphna A.; Tenreiro, Jorge; Sylvester, Mark; Goody, Elizabeth; Augustini, Hope Hall

Subject: RE: Document Production-Recordings

Counsel:

Please let us know whether the recording regarding the all-hands meeting described in the attached

document has been produced. If not, please provide the expected production date as soon as possible.

Regards,

Pascale Guerrier
SECURITIES AND EXCHANGE COMMISSION
New York Regional Office
Brookfield Place
200 Vesey Street, Suite 400
New York, New York 10281-1022
(212) 336-5473
GuerrierP@sec.gov